

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GABRIELA RAMIREZ, FIDELA AVINA,
RUEL NIETO, KATHERINE RANOS, and
EVALINA GONZALEZ, on behalf of
themselves and all others similarly situated,

Plaintiff,

v.

MIDLAND FUNDING, LLC; MIDLAND
CREDIT MANAGEMENT, INC.; and
ENCORE CAPITAL GROUP, INC.,

Defendants.

Case No. 1:17-cv-02626

Judge: Jorge L. Alonso

Magistrate Judge: Susan E. Cox

MOTION TO COMPEL ARBITRATION

Defendants, MIDLAND FUNDING, LLC (MF), MIDLAND CREDIT MANAGEMENT, INC. (MCM) and ENCORE CAPITAL GROUP, INC. (Encore), by and through their attorneys David M. Schultz and Lindsey A.L. Conley of Hinshaw & Culbertson LLP, moves this Honorable Court to compel arbitration of Plaintiffs' claims. Defendants incorporate herein by reference the arguments made and the authorities cited in their Memorandum of Law in support of their Motion to Compel Arbitration which has been filed contemporaneously with the instant motion.

WHEREFORE, Defendants, MIDLAND FUNDING, LLC, MIDLAND CREDIT MANAGEMENT, INC. and ENCORE CAPITAL GROUP, INC., respectfully request that this Court enter an order granting Defendants' motion to compel arbitration.

Respectfully submitted,

MIDLAND FUNDING, LLC, MIDLAND
CREDIT MANAGEMENT, INC. AND
ENCORE CAPITAL GROUP, INC.,
Defendants

/s/Lindsey A.L. Conley

David M. Schultz

Lindsey A.L. Conley

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CERTIFICATE OF SERVICE

I hereby certify that on **March 16, 2018**, I electronically filed with the Clerk of the U.S. District Court, Northern District of Illinois Eastern Division, the foregoing **Motion to Compel Arbitration** by using the CM/ECF system, which will send notification of such filing(s) to:

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/s/ Lindsey A.L Conley
